

Eversheds Sutherland (US) LLP
700 Sixth Street, NW, Suite 700
Washington, DC 20001-3980

D: +1 202.383.0140
F: +1 202.637.3593

lewiswiener@
eversheds-sutherland.com


Application **GRANTED**. Defendants may renew their request for a stay of discovery in connection with the filing of their pre-motion letter or after they answer, move or otherwise respond to the Complaint in their discretion. The parties are reminded of their obligation to diligently complete discovery in accordance with the Case Management Plan issued March 31, 2023.

April 3, 2023

Via ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square, Court Room 1106
New York, New York 10007

Dated: April 4, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Gallagher et al v. National Restaurant Association Solutions, LLC et al*, Case No. 1:23-cv-00435 – Case Management Plan and Scheduling Order Deadlines

Dear Judge Schofield:

Defendants are in receipt of your orders dated March 31, 2023, ECF Nos. 15-16, setting the discovery and motion deadlines for this matter.

In the case management order, ECF No. 16, the Court has set a deadline for any renewed motion to stay discovery be submitted with Defendants' pre-motion letter, due on April 12, 2023. The deadline for Defendants to answer Plaintiffs' amended complaint is currently May 8, 2023. Defendants respectfully request that the Court move the deadline for the motion to stay discovery 30 days to Friday, May 12, 2023. Moving the deadline for the motion to stay discovery until after Defendants' response is submitted will allow the Court the benefit of reviewing Defendants' responsive motions when deciding whether to stay discovery.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Lewis S. Wiener

Lewis S. Wiener

Counsel for Defendants

Cc: Counsel of Record (via ECF)